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August 14, 2018

VIA ECF AND ELECTRONIC MAIL

Honorable Freda L. Wolfson, U.S.D.J.
United States District Court- District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street, Courtroom 5E
Trenton, NJ 08608

**Re: In re: Johnson & Johnson Talcum Powder Products Marketing, Sales
Practices and Products Liability Litigation, MDL No. 2738**

Dear Judge Wolfson:

I am writing on behalf of the Johnson & Johnson defendants to follow up on the recent submission by counsel for Imerys requesting a conference call regarding pending discovery requests in other jurisdictions with respect to certain Transmission Electron Microscopy Grids (“TEM Grids”). Although the interests of the Johnson & Johnson defendants have not been directly implicated by these requests at this point, the same plaintiffs’ attorney mentioned in Imerys’s letter (Mr. Joseph Satterley) has previously demanded from the Johnson & Johnson defendants access to product samples that are subject to protocols adopted by this Court. As such, it is likely that the issues identified in Imerys’s letter will potentially affect my clients’ interests in future discovery disputes, and the Johnson & Johnson defendants respectfully request permission to participate in any conference call that is set up by the Court.

The Johnson & Johnson defendants strongly agree with Imerys that this Court is uniquely positioned to adopt orders and protocols that can resolve the instant discovery dispute and provide guidance for the resolution of others in the future, thereby minimizing tension between federal and state forums. We would like to contribute to any such discussion and participate in crafting a solution that will be acceptable to all parties.

Thank you for your consideration of this letter.

Respectfully,

/s/ Susan M. Sharko

Susan M. Sharko

cc: Hon. Lois H. Goodman, U.S.M.J.
Hon. Joel A. Pisano (Ret.)
Michelle A. Parfitt, Esq.
P. Leigh O’Dell, Esq.
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